



St. Thomas and San Juan Telephone Company, Inc.

March 1, 2010

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington DC, 20554

RE: St. Thomas and San Juan Telephone Company, Inc. CPNI Compliance Certifications
EB Docket # 06-36

Dear Ms. Dortch:

On behalf of St. Thomas and San Juan Telephone Company, Inc. and pursuant to 47 C.F.R. Section 64. 2009 (e), enclosed is the Company's 2009 CPNI Certification.

Very yours truly,

A handwritten signature in dark ink, appearing to read "Theresa Walker", is written over a light blue horizontal line.

Theresa A. Walker

Enclosures

cc: Enforcement Bureau Telecommunications Consumer Division (2 copies)
Best Copy and Printing, Inc. (via email)

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB DOCKET 06-36

Annual 64.2009(e) CPNI Certification for 2009

Date filed: March 1, 2010

Name of company covered by this certification: The St. Thomas and San Juan Telephone Company, Inc.

Form 499 Filer ID: 808677

Name of signatory: Thomas R. Kloster

Title of signatory: Chief Financial Officer

I, Thomas R. Kloster certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions against data brokers in the past year nor have any pretexters attempted to access CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

SIGNED



**THOMAS R. KLOSTER
CHIEF FINANCIAL OFFICER**

CERTIFICATION OF CPNI FILING
MARCH 1, 2010
EB Docket No. 06-36; EB-06-TC-060

Statement of CPNI Procedures and Compliance

St Thomas and San Juan Telephone Company, Inc. ("STSJ VI") does not use, disclose or permit access to CPNI to market any services outside of the "total services approach" as specified in 47 CFR §64.2005. Nor does the Company allow affiliates or third parties access to CPNI for marketing-related purposes and at present does not use, disclose or permit access to CPNI for any marketing purposes at all. If STSJ VI elects to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR §64.2001 *et seq.*, including the institution of operational procedures to ensure that the appropriate notification is provided and customer approval is obtained before CPNI is used or disclosed. STSJ VI will develop and implement an appropriate tracking method to ensure that customers' CPNI approval status can be verified prior to using CPNI for marketing-related purposes. The Company will also adopt the requisite record-keeping requirements should it use CPNI in the future for marketing-related purposes. Outbound marketing situations, if any, are subject to supervisory/management review to ensure compliance with these rules, as necessary.

Consistent with the Commission's rules, STSJ VI uses, discloses, and permits access to CPNI without customer approval for the purposes of: (1) billing and collecting for services rendered; (2) protecting the rights and property of STSJ VI, other users, and other carriers from unlawful use; and (3) providing inside wiring, installation, maintenance, and repair services.

STSJ VI does not currently market to customers that call and make inquiries concerning their account information. But should the Company choose to do so in the future, it will obtain a customer's oral authorization. STSJ VI will also require each representative to provide the disclosures required by 64.2008(c) of the CPNI rules including informing customers of their right to deny access to the CPNI before requesting this one-time consent.

STSJ VI has implemented procedures whereby it will not provide CPNI without proper customer authentication and does not provide call detail records over the phone. Call detail records are provided exclusively via e-mail or U.S. mail, to the postal or electronic address of record. In order to authenticate a customer's identity prior to disclosing CPNI, STSJ VI authenticates the customer using a variety of methods. STSJ VI has implemented procedures to inform customers of change of address, e-mail and other changes to account information in a manner that conforms with the relevant rules. STSJ VI does not allow online access to CPNI.

STSJ VI has implemented procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, STSJ VI will notify affected customers. STSJ VI will maintain a record of any CPNI-related breaches for a period of at least two years.

All STSJ VI employees who have access to CPNI receive training about CPNI compliance. Specifically, a summary of STSJ VI CPNI policies are included in its Employee Handbook, and all employees are required to acknowledge in writing that they have read and understand the information in the Employee Handbook. All STSJ VI employees are required to maintain the confidentiality of all information, including customer information that is obtained as a result of their employment by STSJ VI. Employees who do not abide by these policies or otherwise permit the unauthorized use or disclosure of CPNI will be subject to discipline, including possible termination.